

UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND (BALTIMORE)

ADAM FRAZIER,
Plaintiff,

v.

CENTRAL CREDIT SERVICES,
LLC, *et al.*,
Defendants.

Case No. 1:16-cv-00869-RDB

CENTRAL CREDIT SERVICES, LLC'S
MOTION TO ENFORCE SETTLEMENT AGREEMENT

NOW COMES Defendant Central Credit Services, LLC (“CCS”), by and through undersigned counsel, and hereby moves to enforce the settlement agreement entered into between plaintiff Adam Frazier (“plaintiff”), and defendant CCS. As more fully stated in the Memorandum attached hereto, the plaintiff and CCS agreed to settle the matter as to all defendants for \$3,500 and confirmed their agreement via email. Undersigned counsel and a representative of CCS cancelled travel plans for depositions in reliance of the settlement.

The plaintiff now refuses to sign a settlement agreement and is demanding more money. The plaintiff cannot now renege on the agreement between the parties based on a subsequent change of heart.

WHEREFORE, Defendant, Central Credit Services, LLC respectfully requests the Court enforce the settlement agreement reached between the plaintiff and CCS, and dismiss the lawsuit with prejudice, thereby resolving all issues in the above-captioned matter.

Respectfully submitted,

s/ Michael Alltmont

Michael Alltmont (pro hac vice)

Kristen Burge (pro hac vice)

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Attorneys for Defendant,

Central Credit Services, LLC

CERTIFICATE OF SERVICE

I certify that on this 3rd day of February, 2017, a copy of **Defendant, Credit Financial Services, LLC's Motion to Enforce Settlement Agreement** was filed electronically in the ECF system. Notice of this filing will be sent to plaintiff *pro se* via Federal Express and electronic mail to the following addresses.

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Plaintiff *Pro Se*

By: s/ Michael Alltmont
Michael Alltmont, Esq.
Attorney for Defendant,
Central Credit Services, LLC